

LIPMAN DECLARATION

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

ADAPTIX, INC.,

Plaintiff,
v.

ALCATEL-LUCENT USA, INC. and
AT&T MOBILITY LLC,

Defendants.

Civil Action 6:12-cv-00022 (MHS-CMC)

JURY TRIAL DEMANDED

ADAPTIX, INC.,

Plaintiff,
v.

ALCATEL-LUCENT USA, INC. and
CELLCO PARTNERSHIP *d/b/a*
VERIZON WIRELESS,

Defendants.

Civil Action No. 6:12-cv-00122 (MHS-CMC)

JURY TRIAL DEMANDED

ADAPTIX, INC.,

Plaintiff,
v.

ALCATEL-LUCENT USA, INC. and
SPRINT SPECTRUM L.P.,

Defendants.

Civil Action No. 6:12-cv-00123 (MHS-CMC)

JURY TRIAL DEMANDED

**DECLARATION OF STEVEN E. LIPMAN IN SUPPORT OF PLAINTIFF'S
MOTION TO COMPEL SOURCE CODE**

I, Steven E. Lipman, declare as follows:

1. I am counsel with the law firm of Hayes Messina Gilman & Hayes, LLC ("HMGH"), attorneys for Plaintiff, Adaptix, Inc. ("Adaptix"), in the above-styled actions;

2. I submit this Declaration in support of Plaintiff's Motion to Compel Source Code. I am competent to testify to the matters stated in this Declaration and each of the facts is true and correct to the best of my knowledge;
3. Attached as Attachment A is a Table Listing of 31 true and correct cut-and-pasted individual e-mail communications between Adaptix and ALU counsel, numbered as Exhibits 1 through 31, concerning the underlying Motion; and
4. I declare under the pains and penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 31st day of March, 2014, at Boston, Massachusetts.

/s/ Steven E. Lipman
Steven E. Lipman